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*Attorneys for Plaintiffs*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:
	: Chapter 11
	:
LIGHTSQUARED INC., et al.,	: Case No. 12-12080 (SCC)
	:
	: Jointly Administered
Debtors.	:
	: Adv. Proc. No. 13-01390 (SCC)
-----	X
LIGHTSQUARED LP, LIGHTSQUARED INC.,	:
LIGHTSQUARED INVESTORS HOLDINGS INC.	:
TMI COMMUNICATIONS DELAWARE	:
LIMITED PARTNERSHIP, LIGHTSQUARED GP INC.,	:
ATC TECHNOLOGIES, LLC, LIGHTSQUARED CORP.,	:
LIGHTSQUARED INC. OF VIRGINIA,	:
LIGHTSQUARED SUBSIDIARY LLC,	:
SKYTERRA HOLDINGS (CANADA) INC., AND	:
SKYTERRA (CANADA) INC.	:
	:
Plaintiff-Intervenors,	:
	:

- against- :  
:   
SP SPECIAL OPPORTUNITIES, LLC, :  
DISH NETWORK CORPORATION, :  
ECHOSTAR CORPORATION, :  
AND CHARLES W. ERGEN, :  
Defendants. :  
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**PLAINTIFFS' SUPPLEMENTAL PROPOSED FINDINGS OF FACT**

Plaintiffs LightSquared LP, LightSquared Inc., LightSquared Investors Holdings Inc., TMI Communications Delaware Limited Partnership, LightSquared GP Inc., ATC Technologies, LLC, LightSquared Corp., LightSquared Inc. of Virginia, LightSquared Subsidiary LLC, SkyTerra Holdings (Canada) Inc., and SkyTerra (Canada) Inc., as debtors and debtors in possession (collectively, with certain of their affiliate debtors and debtors in possession, "LightSquared") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") and plaintiff-intervenors in this adversary proceeding, and Harbinger Capital Partners LLC, HGW US Holding Company LP, Blue Line DZM Corp., and Harbinger Capital Partners SP, Inc. (collectively, "Harbinger," and with LightSquared, "Plaintiffs"), respectfully submit the following Supplemental Proposed Findings of Fact to incorporate documentary evidence first disclosed by Defendants during plan confirmation discovery.

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New York, New York  
Dated: March 10, 2014

Respectfully submitted,

/s/ Alan J. Stone

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